

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LAUREN ASHLEY MORGAN; ERIK BARNES;
SHERRY BASON; LOIS WINN; GEORGES
EMMANUEL NJONG DIBOKI; JULIA SIMS; and
SOPHIA WOODLAND, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

REALPAGE, INC.; GREYSTAR REAL ESTATE
PARTNERS, LLC; LINCOLN PROPERTY CO.;
CUSHMAN & WAKEFIELD, INC.; FPI
MANAGEMENT, INC.; RPM LIVING, LLC; BH
MANAGEMENT SERVICES, LLC; MID-
AMERICA APARTMENT COMMUNITIES, INC.;
MORGAN PROPERTIES, LLC; AVENUE5
RESIDENTIAL, LLC; BOZZUTO
MANAGEMENT COMPANY; AVALONBAY
COMMUNITIES, INC.; HIGHMARK
RESIDENTIAL, LLC; EQUITY RESIDENTIAL;
THE IRVINE COMPANY, LLC; ESSEX
PROPERTY TRUST, INC.; ZRS MANAGEMENT,
LLC; CAMDEN PROPERTY TRUST; UDR, INC.;
CONAM MANAGEMENT CORPORATION;
CORTLAND PARTNERS, LLC; THRIVE
COMMUNITIES MANAGEMENT, LLC;
SECURITY PROPERTIES INC.; CWS
APARTMENT HOMES, LLC; PROMETHEUS
REAL ESTATE GROUP, INC.; SARES REGIS
GROUP OPERATING, INC.; MISSION ROCK
RESIDENTIAL, LLC; and MORGAN GROUP,
INC.,,

Defendants.

CASE NO. 2:22-CV-01712-RSL

SECURITY PROPERTIES, INC.'S
STIPULATED MOTION TO JOIN
STIPULATED MOTION AND
ORDER SUSPENDING DEADLINE
FOR CERTAIN DEFENDANTS TO
RESPOND TO COMPLAINT

Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiffs Lauren Ashley Morgan,
Erik Barnes, Sherry Bason, Lois Winn, Georges Emmanuel Njong Diboki, Julia Sims, and Sophia

1 Woodland (collectively, “Plaintiffs”) and Defendant Security Properties, Inc., by and through their
2 respective counsel, hereby stipulate as follows:

3 WHEREAS, Plaintiffs filed a Class Action Complaint (the “Complaint”) on December 2,
4 2022. ECF No. 1.

5 WHEREAS, Plaintiffs served the Defendant Security Properties, Inc., with process on or
6 about December 12, 2022.

7 WHEREAS, Plaintiffs and Defendants RealPage, Inc., Greystar Real Estate Partners, LLC,
8 Lincoln Property Co., Cushman & Wakefield, Inc., FPI Management, Inc., BH Management
9 Services, LLC, Mid-America Apartment Communities, Inc., Bozzuto Management Company,
10 AvalonBay Communities, Inc., Highmark Residential, LLC, Equity Residential, Essex Property
11 Trust, Inc., Camden Property Trust, UDR, Inc., Thrive Communities Management, LLC, and
12 Prometheus Real Estate Group, Inc., (collectively, the “Certain Defendants”) filed the Stipulated
13 Motion and Order Suspending Deadline For Certain Defendants To Respond To Complaint
14 (“Certain Defendants Motion”) on December 20, 2022.

15 WHEREAS, Defendant Security Properties, Inc. is similarly situated with respect to the
16 facts presented and knowledge of other similar pending matters as presented in the Certain
17 Defendants Motion.

18 WHEREAS, on December 21, 2022, the Honorable Judge Lasnik entered an Order
19 suspending the deadline for the Certain Defendants to answer, move to dismiss, or otherwise
20 respond to the Complaint, and set a January 18, 2023, deadline the Plaintiffs and Certain
21 Defendants to meet and confer and file a status report with the Court.

22 WHEREAS, Plaintiffs and Security Properties, Inc. have conferred and agreed that party
23 and judicial efficiency would be best served by suspending, for a short period of time, the deadline
24 for the Security Properties, Inc. to answer, move to dismiss, or otherwise respond to the Complaint.

25 WHEREAS, Plaintiff and Security Properties, Inc. have agreed to meet and confer and file
26 a status report with the Court by January 18, 2023, related to a schedule for the case.

27 THEREFORE, Plaintiffs and Security Properties, Inc. stipulate and agree to suspend the

1 deadline for Security Properties, Inc. to answer, move to dismiss, or otherwise respond to the
2 Complaint and request that the Court enter the subjoined order pursuant to this stipulation.

3
4 STIPULATED to this 29th day of December, 2022.

5
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15 *Counsel for Plaintiffs Morgan, Barnes, Bason,*
16 *Winn, Diboki, Sims, and Woodland, and on*
17 *Behalf of All Others Similarly Situated*

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Attorneys for Security Properties, Inc.

ORDER

THIS MATTER came before the Court on the Security Properties, Inc.'s Stipulated Motion to Join Stipulated Motion and Order Suspending Deadline for Certain Defendants to Respond to Complaint. Now, therefore,

IT IS HEREBY ORDERED THAT:

The deadline for Defendant Security Properties, Inc., to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended.

Plaintiffs and Defendant Security Properties, Inc., shall meet and confer and file a status report with the Court by January 18, 2023.

Dated this 29th day of December, 2022.



Robert S. Lasnik
United States District Judge